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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA, ) **2:13-CR-00038-JCM-PAL**  
Plaintiff, )  
vs. ) **STIPULATION FOR PROTECTIVE ORDER**  
ANDREI RAILEANU, )  
Defendant. )

IT IS HEREBY STIPULATED AND AGREED between the parties, Daniel G. Bogden, United States Attorney for the District of Nevada, and Kimberly M. Frayn, Assistant United States Attorney, counsel for the United States, Gabriel L. Grasso, Esq., counsel for defendant ANDREI RAILEANU, that this Court issue an Order protecting from disclosure to the public any discovery documents containing the personal identifying and financial identifying information, such as social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit card numbers, and addresses, of participants, witnesses and victims in this case. Such documents shall be referred to hereinafter as "Protected Documents." The parties state as follows:

1. Protected Documents which will be used by the government in its case in chief include personal identifying information and financial identifying information, such as social

1 security numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit  
2 card numbers, and addresses, of participants, witnesses, and victims in this case.

3       2. Discovery in this case includes many of documents which contain personal and  
4 financial identifiers. Redacting the personal and financial identifiers of participants, witnesses,  
5 and victims would prevent the timely disclosure of discovery to defendants.

6       3. The United States agrees to provide Protected Documents without redacting the  
7 personal identifiers and financial identifiers of participants, witnesses, and victims.

8       4. Access to Protected Documents will be restricted to persons authorized by the  
9 Court, namely defendant, attorney(s) of record and attorneys' paralegals, investigators, experts,  
10 and secretaries employed by the attorney(s) of record and performing on behalf of defendant.

11       5. The following restrictions will be placed on defendant, defendant's attorney(s) and  
12 the above-designated individuals unless and until further ordered by the Court. Defendants,  
13 defendants' attorneys and the above-designated individuals shall not:

- 14           a. make copies for, or allow copies of any kind to be made, by any other  
15 person of Protected Documents;
- 16           b. allow any other person to read Protected Documents; and
- 17           c. use Protected Documents for any other purpose other than preparing to  
18 defend against the charges in the Indictment or any further superseding indictments arising out of  
19 this case.

20       6. Defendant's attorney(s) shall inform any person to whom disclosure may be made  
21 pursuant to this order of the existence and terms of this Court's order.

22       7. The requested restrictions shall not restrict the use or introduction as evidence of  
23 discovery documents containing personal identifying and financial identifying information, such as  
24 social security numbers, drivers license numbers, dates of birth, bank account numbers, credit and  
25 debit card numbers, and addresses, of participants, witnesses and victims during the trial of this  
26 matter.

1       8. Upon conclusion of this action, defendant's attorney(s) shall return to government  
2 counsel or destroy and certify to government counsel the destruction of all discovery documents  
3 containing personal identifying and financial identifying information such as social security  
4 numbers, drivers license numbers, dates of birth, bank account numbers, credit and debit card  
5 numbers, and addresses, within a reasonable time, not to exceed thirty days after the  
6 last appeal is final.

8 DANIEL G. BOGDEN  
United States Attorney

10 /s/ Kimberly M. Frayn  
11 KIMBERLY M. FRAYN  
Assistant United States Attorney

February 22, 2013  
DATE

13     /s/ Gabriel L. Grasso, Esq.  
14     GABRIEL L. GRASSO, ESQ.  
      Counsel for defendant  
      ANDREI RAILEANU.

February 22, 2013  
DATE

## ORDER

IT IS SO ORDERED this 49<sup>th</sup> day of Hgdt wct { ."2013.

Terry A. Teer  
UNITED STATES MAGISTRATE JUDGE